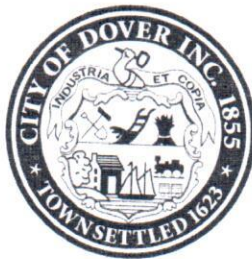


JOHN B. STORER, P.E.
Director Community Services
j.storer@dover.nh.gov

RAYMOND VERMETTE JR.
Facility Supervisor
r.vermette@dover.nh.gov

ARNOLD POWERS
Laboratory Supervisor
a.powers@dover.nh.gov



484 Middle Road
Dover, New Hampshire 03820-4931
(603) 516-6475
Fax: (603) 516-6477
www.dover.nh.gov

City of Dover, New Hampshire

COMMUNITY SERVICES DEPARTMENT
WASTEWATER TREATMENT FACILITY
INDUSTRIAL PRETREATMENT
A DIVISION OF WASTEWATER TREATMENT
FOR THE CITY OF DOVER

Mark Theriault
Facility Manager
CYN Environmental Services
Dover, NH 03820

02/18/21

NOTICE OF VIOLATION

In the matter of the CYN Environmental's discharge to the sanitary sewer, a sample collected on 01/22/21 indicates that a violation of the sanitary sewer discharge limits occurred.

These findings are made and notice issued pursuant to the authority vested in the City Manager under section 121-11 of the City's Sewer Use Ordinance.

One or more of the numerical limits or requirements indicated in CYN's discharge permit #1012C were exceeded as follows:

<u>Sample</u>	<u>Local</u>	<u>Federal</u>
<u>Concentration</u>	<u>Uniform Conc. Limit</u>	<u>DailyMax./ Monthly Avg</u>

Copper .467 mg/L	-----	Copper .405 / -----
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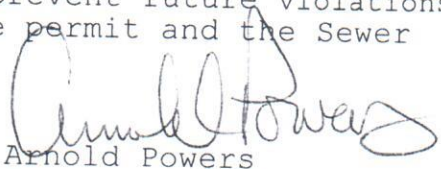
NOTICE

This violation alone or along with future violations may subject CYN Environmental to Significant Noncompliance (SNC).

Therefore based on the above findings, CYN Environmental is hereby notified that:

- 1) It must re-sample and report within 30 days.
- 2) It must Identify the cause of the violation.
- 3) It must explain what it will do to prevent future violations.
- 4) It is in violation of it's discharge permit and the Sewer Use Ordinance of the City of Dover.

Signed:


Arnold Powers
Pretreatment Coordinator

RECEIPT OF NOV

Explain item #2, and #3 above:

I received the Notice of Violation (NOV) for the 01/22/21
wastewater discharge which exceeded the Federal discharge
limit of copper at CYN Environmental.

The NOV was dated 02/18/21.

SIGNED,

Mark Theriault

Please Return this receipt signed to:

Dover WWTF
484 Middle Rd
Dover, NH 03820
Attn: Pretreatment



Cyn Oil Corp
8 Progress Dr
Dover, NH 03820
508.415.1025

January 25, 2022

Dover POTW
Attention: Arnold Powers
484 Middle Rd
Dover, NH 03820-4932

Re: Notice of Violation 2/18/2021

Dear Mr. Powers:

Please find below the information requested regarding items #2 and #3 for the NOV issued on 2/18/2021.

Item # 2

The discharge that took place from the sample collected on 1/22/2021 having high levels of Copper was not reviewed before the discharge took place. Given the fact that there have been changes in staffing there was a lack of communication between the time the analysis was reviewed and when the water was discharged. After having a meeting with the POTW a plan has been put in place, so this type of incident will be mitigated in the future. Logs and review processes have been amended to assure this will not be a reoccurring event.

Item #3

To prevent future violations the analytical will be reviewed by two different individuals.

Once the analysis has been reviewed the two people reviewing will agree or discuss any disagreements. Once any disagreements have been resolved the discharge will either take place or not.

REC. 01/25/22

THIS NOV RESPONSE WAS
MISSED BY THE CIU AND
PRETREATMENT COORDINATOR.
IT WAS CAUGHT IN THE REVIEW
FOR THE ANNUAL REPORT.
CIU WAS CONTACTED AND
THEY SUBMITTED THE RESPONSE.



Cyn Oil Corp
8 Progress Dr
Dover, NH 03820
508.415.1025

Should you have any questions, contact me at 580.415.1025

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Theriault". The signature is fluid and cursive, with the last name "Theriault" being more prominent.

Mark Theriault
ECM Dover WWT Facility

CC: 999 Files

COPY, ORIGINAL WITH
INSPECTION REPORT

DOUGLAS W. STEELE II
Director Community Services

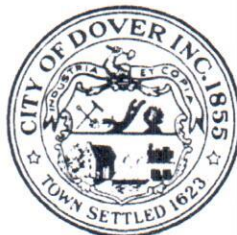
d.steele@dover.nh.gov

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City of Dover, New Hampshire

COMMUNITY SERVICES DEPARTMENT
WASTEWATER TREATMENT FACILITY

May 6, 2021

Mark Theriault
Project Manager
CYN Environmental, Inc.
8 Progress Dr.
Dover, NH 03820

RE: Industrial Inspection

Dear Mr. Theriault:

This is a follow up response to the City of Dover's Industrial Pretreatment inspection at your facility conducted on 04/22/21, and the subsequent meeting 05/05/21.

The inspection evaluated your record keeping, treatment systems, discharge tanks, and pertinent areas of your facility.

In reviewing some of your discharge logs they did not correlate with other logs regarding the same tank number and discharge days. You said you would look into this and respond as to what happened. Also, pertaining to your discharge logs a section of the log was blackened out. We've discussed this in the past, blacking out logs is prohibited, if it's a correction one line through the mistake initial and date, and make the correction. In this case which you said the load was checked in but then taken to Stoughton Mass. the best fix would be entering in the boxes "it was taken to Stoughton", and a line in any empty boxes. Lastly, the volume listed on your non-haz. discharge log (12,563) doesn't agree with the corrected volume (16,500) on the additional page of the water taken to Stoughton, a difference of about 4,000 gals. The purpose of the logs is to demonstrate tracking that everything correlates and is accounted for. In this case it's not demonstrating that. As we discussed there needs to be a second set of eye's for QC here on the logs.

Please include the three additional columns we generated to the logs for you and myself to better track your water.

We discussed a repetitive receipt temperature on a lot of the c-o-c from the lab receiving your samples which is highly unlikely, and a few times it was never recorded, you said you'd follow up on this.

You indicated you'd follow up on the installation date of a new flow meter, and more separation between stored soda ash and the hydrogen peroxide, as one is a strong acid and one is a strong base.

Finally, you indicated you'd make sure the garage had an impervious surface with regard to groundwater concerns, therefore, if you could provide a proposed completion date for this.

Thank you for your assistance with Dover's Industrial Pretreatment Program.
If there are any questions regarding this information please contact me at 516-6475.

Sincerely,

Arnold Powers
Industrial Pretreatment Coordinator

2 RESPONSES HERE 05/26/21 05/27

REQUESTED MORE COMPREHENSIVE RESPONSE

Powers, Arnold

From: Theriault, Mark L <mark.theriault@cynenv.com>
Sent: Wednesday, May 26, 2021 8:37 AM
To: Powers, Arnold
Subject: Inspection

Security Notice: External sender. Use caution with hyperlinks or attachments.

Arnie,

I think I have fixed the logs but after looking at them for several hours I was getting cross-eyed...

1. As we discussed I think it was just an error on my part as to the correlation of the logs. Rudy will now be my second set of eyes at the facility.
2. I removed the black out section from the log and replaced with "Shipped to Stoughton"
3. There was an additional load sent to Stoughton that I was unaware of as I was traveling.
4. I spoke to the lab regarding the temperature check. She informed me same day sampling does not require a log-in temp check but they do it anyway.
5. The flow meter was backordered from Webb so it has been reordered through Grainger
6. I spoke to my guy that runs the construction division and as soon as he has the time he is going to head up to fix

Can you send me a copy of the sheets we are going to edit. I moved my office to home and I only have the PCB login sheet.

The guys that packed me up must have lost them.

Thanks...

Mark Theriault

Sr. Environmental Compliance Manager

(o) 781.341.5108

(C) 508.415.1025

Mark.theriault@cynenv.com

Safety Starts with me! Live it 3-6-5

Powers, Arnold

From: Theriault, Mark L <mark.theriault@cynenv.com>
Sent: Thursday, May 27, 2021 2:35 PM
To: Powers, Arnold
Subject: Inspection
Attachments: Copy of 2021 Discharge Log.xls; Copy of 2021 Non Haz Water log.xls; Copy of 2021 PC Tank log.xls

Security Notice: External sender. Use caution with hyperlinks or attachments.

Arnie,

Floor....The floor will be repaired sometime in the Early August time frame. If Cyn can not fix the floor I will hire an outside contractor.

Paul will try to schedule his guys but outside work comes first.

Blacked out Log....As I explained when we met...the blacked out cells were not covering data...they were merely a space holder showing the water did not come into Cyn.
(I have Paperwork showing the outbound loads) The log has been fixed removing the blacked out cells.
The paperwork will show the difference in volume from what came in and what left the facility. Keeping in mind there is always some volume in the tank.

Discharge Dates....As for the PCB tank log....after reviewing what I have, tank one was sampled on 4/7 and tank two was discharged on 4/7.

I inadvertently put the sampled tank on the log. The log has been corrected to show the correct discharge tank.
Also some of the pcb discharges were on the non haz water log inadvertently. This has been corrected as well.

Log Review....As I stated to you during the inspection Rudy will be working with me and will be transitioned to log and track all the incoming loads of water.
That process will start over the next few weeks.

Material on the Floor....Spill pallets have been ordered for the peroxide and soda ash issue. Once those arrive at the facility we will segregate the product.

COC Temperatures....I spoke to the lab regarding the temperature on the COC and this will be addressed.

Just as an aside I am going to work with Rudy to come up with a better solution for the logs.
We have two waste streams into the facility and between the City and the EPA I have 5 logs.

Take a look at everything and let me know. I believe I have the logs updated and the sample dates and discharge dates line up.

I am a little bug eyes so I may have missed something.

Thanks,

Mark

Mark Theriault

Sr. Environmental Compliance Manager

(o) 781.341.5108

(C) 508.415.1025

Dover Wastewater Treatment Plant

TELEPHONE CONVERSATION RECORD

Date: 08/04/21

Time: 12.30

Person called/calling: MARK THERIAULT

Name of firm: CYN ENVIRONMENTAL

Subject Matter: RECENT DISCHARGE WITH GASOLINE ODOR

Conversation:

MARK SAID HE WAS CALLING TO LET ME KNOW WHERE CYN WAS AT REGARDING THE GAS ODOR ISSUE. HE'S SPOKE TO HIS COMPLIANCE SUPERVISOR AND OPERATIONS MANAGER AND MADE THEM AWARE OF THE SITUATION. HE SAID HE HAD ^A GOOD LAB REPORT TO DISCHARGE TANK 1, & TANK 3 WAS SAMPLED WHEN I WAS THERE. ~~AND~~ SO HE'LL DISCHARGE TANK 1 & WITH GOOD RESULTS TANK 3. THEN ALL 3 TANKS WILL BE EMPTY & THEY WILL BE CLEARED. THEN IN SEPT. THE FRAG. TANK WILL BE CLEARED. NO WATER WILL BE TAKEN IN UNTILL CYN CLEANS FRAG. TANK. ~~WILL~~ MEET WITH RUDY, ^{FACILITY MGR.} HIS OPERATIONS MGR. RICH, & HIMSELF ON GOING FORWARD WITH RUDY OVERSEEING THE LOGS & DISCHARGES IN THE FUTURE. MEETING APPROX. 2 WKS. OUT.

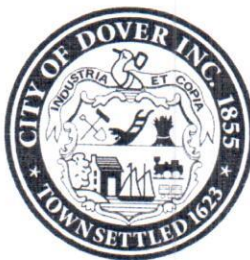
Jimmy & I

Treatment Plant Personage: Amelia Powers

JOHN B. STORER, P.E.
Director Community Services
j.storer@dover.nh.gov

RAYMOND VERMETTE JR.
Facility Supervisor
r.vermette@dover.nh.gov

ARNOLD POWERS
Laboratory Supervisor
a.powers@dover.nh.gov



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City of Dover, New Hampshire

COMMUNITY SERVICES DEPARTMENT
WASTEWATER TREATMENT FACILITY
INDUSTRIAL PRETREATMENT
A DIVISION OF WASTEWATER TREATMENT
FOR THE CITY OF DOVER

Mark Theriault
Compliance Manager
CYN Environmental Services
Dover, NH 03820

08/09/21

NOTICE OF VIOLATION

In the matter of CYN Environmental's discharge to the sanitary sewer, a gasoline fume/odor from discharge tank 2, and downstream sanitary sewer manholes was observed on 08/03/21 at the end of a discharge. Also, their discharge logs weren't up to date and maintained.

These findings are made and notice issued pursuant to the authority vested in the City Manager under section 121-11 of the City's Sewer Use Ordinance.

One or more of the numerical limits or requirements indicated in CYN's discharge permit #1012C were in noncompliance as follows: Part 1 Section B Interference, Prohibited Discharge, Part 4 Section B Operation & Maintenance, Duty to Mitigate, and Part 4 Section D Retention of Records.

DIDNT MEET REQ. OF DEF. OF INTERFERENCE

<u>Sample</u>	<u>Local</u>	<u>Federal</u>
<u>Concentration</u>	<u>Uniform Conc. Limit</u>	<u>DailyMax./ Monthly Avg</u>
-----	-----	----- / -----

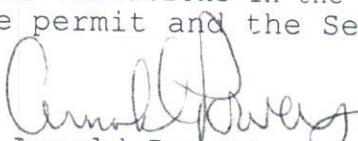
NOTICE

These violations alone or along with future violations may subject CYN Environmental to Significant Noncompliance (SNC).

Therefore, based on the above findings, CYN Environmental is being assessed a noncompliance fee/fine for Inadequate Record Keeping \$100, and Failure To Mitigate \$200 so \$300 total and is hereby notified that:

- 1) It must cease all prohibited discharges, and maintain its discharge logs.
- 2) It must Identify the cause of these violations.
- 3) It must explain the prevention of these violations in the future.
- 4) It is in violation of its discharge permit and the Sewer Use Ordinance of the City of Dover.

Signed:


Arnold Powers
Pretreatment Coordinator

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Bank of America

51-44/119

Date 08.Oct.2021

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Norwell, MA 02061-9149

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Pay Amount \$300.00***

Non-Negotiable after 180 Days

To The
Order Of
CITY OF DOVER NH
PO BOX 818
DOVER, NH 03821-0818

Co-Signature Required over \$250,000.00

Authorized Signature

⑈ 2087192⑈ ⑆011900445⑆

68490⑈

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Tag	Amount	Note	Serial Number	Volume ID Customer Data	Item Date	ImgVolNo	Account Number Issue Date
No	300.00	No	2087192	21110210034301 0000109322	10/29/2021	1	68490

FURTHER EXPLANATION OF CYN'S NOV

- 1) Storage and discharge tanks are not being maintained, and have settleable and floatable sludge. The sludge is having a negative impact contributing to a deleterious wastewater from CYN.
- 2) Discharge with identifiable gasoline fume/odor during and at the end of a discharge.
- 3) Operational or treatment activities are not documented on the day the activity or action is carried out. This undermines the purpose of the logs. The logs are to prevent confusion and accurately track the generator, treatment, tank#, dates, volumes, sampling, analytical, discharges, and tank cleanings all of CYN's wastewater.

RECEIPT OF NOV

Explain item #2, and #3 above:

I received the Notice of Violation (NOV) for the 08/03/21 discharge causing a gasoline odor in the sanitary sewer, and failure to maintain treatment/discharge logs.

The NOV was dated 08/09/21. , .

SIGNED,

Mark Theriault

Please Return this receipt signed to:

Dover WWTF
484 Middle Rd
Dover, NH 03820
Attn: Pretreatment



Cyn Oil Corp
8 Progress Dr
Dover, NH 03820
508.415.1025

September 24, 2021

Dover POTW
Attention: Arnold Powers
484 Middle Rd
Dover, NH 03820-4932

Re: Notice of Violation 8/9/2021

Dear Mr. Powers:

Please find below the information requested regarding items #2 and #3 for the NOV issued on 8/9/2021.

Item # 2

The discharge that took place on 8/3/2021 during a visit by the POTW was found to have levels of benzene that exceeded the allowable discharge levels permitted by the city. After investigating the source of the benzene, Cyn was able to trace the contamination back to the frac tank inside the building. This frac tank is used to store untreated non-hazardous water. The tank was found to have a layer of oil/gas. Cyn will stop treating water from that tank until it has been cleaned and inspected by a representative of the POTW. Cyn was also able to confirm that contaminants of sludge at the bottom of the discharge tank(s) may have contributed to the levels of benzene. Cyn will now be cleaning the discharge tanks after 30 qualified discharges from an individual discharge tank. Cyn will amend the discharge logs to document when a tank will be taken out of service, cleaned and put back into service.

Item #3

As to the issue of the logs not being documented on the day of the activity Cyn along with the POTW has worked out a solution. Because of job function changes at the facility Cyn has identified Rudy Longo as the facility contact and day to day operation manager. Rudy will now be signing all incoming manifests as well as maintaining the operational logs. Logs will now be completed on



Cyn Oil Corp
8 Progress Dr
Dover, NH 03820
508.415.1025

the day the material arrives at the facility baring sick days or vacations. In the event of scheduled time off Rudy will update the logs upon his return to work.

Should you have any questions, contact me at 580.415.1025

Sincerely,

Mark Theriault
ECM Dover WWT Facility

CC: 999 Files

INDUSTRIAL PRETREATMENT

Meeting Record


Industry: Cyn Environmental

Date: 09/16/21

Attendance: Mark Theriault, Rudy Longo, James Casey, Arnold Powers

Subject: Violations and discharge tracking log

The meeting started by reviewing the incident of a discharge with a gasoline odor, and showing a test result from that discharge tank's residue. It was explained that there was an exceedance of a screening/ limit for organics. Then we discussed the background of the tracking logs being hard to work with because they're confusing, and the need for them to be streamlined down to 3 logs. I brought copies of Cyn's past logs for Rudy to work with to generate the 3 good logs. We discussed Mark's current position keeping him away from the facility and not being able to keep up with the work as being part of the problem. It is the City's understanding that this is why Rudy is being brought in, to manage and run the day to day treatment, tracking/documentation on logs, and discharges. I then went over the NOV and the fine for the discharge with the gasoline odor. We also discussed a discharge on 08/03/21 that had the wrong tank #3 on the c-o-c and lab report because tank #2 was discharged that day. After discussing these matters we said we're expecting to have Rudy here for his oversight of the day to day activities such as treatment, maintaining logs, and discharges so that these issues will cease, Cyn agreed. Therefore, we'll monitor these things from this point going forward.



Arnold Powers
Industrial Coordinator